

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

In Re: \*  
\* Bankruptcy Case  
MIGUEL ANGEL MARZAN BONILLA \* No. 10-06173(ESL)  
MAYRA BELEN DIAZ LAUREANO \*  
Debtor(s) \* CHAPTER 13  
\*  
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**STIPULATION**

**TO THE HONORABLE COURT:**

Come now, Banco Popular de Puerto Rico/WB (pursuant to Purchase & Assumption Agreement signed on 4-30-2010) ("BPPR") and debtors, through their respective undersigned counsels, and very respectfully state and stipulate as follows:

1. BPPR is the holder of a secured claim in the present case for \$506,871.94.
2. The security for this claim consists of the following:  
Mortgage notes for \$450,000 and \$25,000, plus interest, secured with first and second mortgage over property in Santa Juanita, Bayamón, PR ("Finca" 32108).
3. The appearing parties have reached an agreement for payment of the aforementioned claim, which is as follows:
  - a) Commencing on October 25, 2010, and for the following twenty four (24) months, debtors will make direct monthly payments to BPPR for \$2600.

- b) In the meantime, debtors will try to refinance the aforementioned property to pay BPPR's secured claim in full.
- c) In the event debtors are not able to refinance their property within the 24 month period, no later than October 15, 2012, the appearing parties will meet to increase the present payment plan, as long as it does not affect debtors' compliance with the C-13 payment plan until its completion.
- d) The pre-petition arrears for \$42,702.94, will be paid through the Trustee.

4. In the event debtors fail to make two (2) consecutive monthly payments to appearing creditor, BPPR will provide them with written notice of the arrears through their legal representation. If the arrears are not cured within fifteen (15) business days of receipt of notice by counsel, BPPR will request the dismissal or conversion of this case to Chapter 7. Also, a stipulation for lift of stay will be considered at such time.

5. The purpose of this stipulation is to establish a repayment schedule of debtors' existing debt with BPPR, not to originate a new obligation towards the Bank.

6. In the event the above captioned case is converted to Chapter 7, debtors consent to the lifting of the automatic stay in favor of BPPR. However, BPPR will not initiate foreclosure proceedings until the Chapter 7 Trustee has filed the corresponding Notice of Abandonment.

7. If this case is dismissed, BPPR may continue with this agreement subject to debtors' compliance. Otherwise, BPPR may modify or terminate it.

8. No delay or failure of BPPR in exercising its rights, power and privileges hereunder will be considered a waiver thereof.

9. The terms of this agreement shall bind the parties and their respective successors, privies and assigns.

10. This agreement does not in any way release or affect the obligation for parties who may be liable with debtors on this claim.

11. The appearing parties warrant that the terms and conditions set forth herein are reasonable under the circumstances and that they have acted in good faith in connection with the negotiations of this stipulation and in moving the Court for an Order approving the same.

**WHEREFORE**, it is respectfully requested from this Honorable Court to enter an Order approving this stipulation.

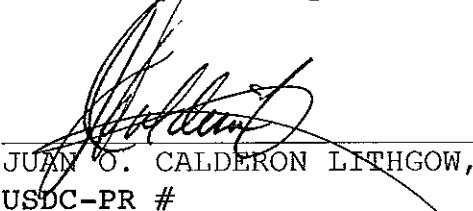
**NOTICE OF RESPONSE TIME**

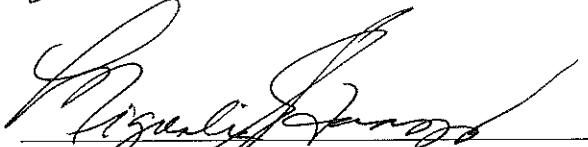
You are hereby notified of the filing of a **STIPULATION** by **BANCO POPULAR DE PUERTO RICO**. If within twenty one (21) days after service as evidenced by this certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, must serve and file an objection or other appropriate response to this paper with the Clerk's office of the US Bankruptcy Court for

the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the stipulation will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

**I HEREBY CERTIFY:** That the preceding document has been electronically filed with the Clerk of the Court, using the CM/ECF System. Notice has been sent electronically to attorney for debtors', Juan O. Calderón Lithgow, Esq., juan004@prtc.net; Alejandro Oliveras Rivera, Trustee, aorecf@ch13sju.com; UST, ustpregion21.hr.ecf@usdoj.gov; and by mail to the debtors, Miguel Angel Marzáñ Bonilla and Mayra Belén Díaz Laureano, Villa Rica Dev., AN 31 Evans Street, Bayamón, PR 00959; and other non/CEF participants included in the attached master address list.

Respectfully submitted on this 28<sup>th</sup> day of October, 2010.

  
JUAN O. CALDERON LITHGOW, ESQ.  
USDC-PR #  
Attorney for Debtors  
PO Box 1710  
Vega Baja PR 00694  
Tel. 787-858-5476  
Fax 787-858-5476  
juan004@prtc.net

  
MIGDALIA EFFIE GUASP, ESQ.  
USDC-PR #205203  
Banco Popular de PR  
Special Loans Department  
PO Box 362708  
San Juan PR 00936-2708  
Tel. 787-764-3983  
Fax 787-281-4140  
megbky@bppr.com

Label Matrix for local noticing  
0104-3  
Case 10-06173-ESL13  
District of Puerto Rico  
Old San Juan  
Thu Oct 28 15:21:18 AST 2010

COOP. CIALES  
APARTADO 1438  
CIALES, PR 00638-1438

BANCO BILBAO VIZCAYA  
ANGEL M VAZQUEZ BAUZA  
PO BOX 191017  
SAN JUAN, PR 00919-1017

BANCO SANTANDER PR  
RAMOS & BAGUE LAW OFFICE  
PO BOX 306  
CAGUAS, PR 00726-0306

FIRSTBANK PUERTO RICO  
MELENDEZ PEREZ, DE DIEGO & JIMENEZ  
PO BOX 19328  
SAN JUAN, PR 00910 1328

POPULAR AUTO  
EDGAR A VEGA RIVERA ESQ  
PO BOX 366818  
SAN JUAN, PR 00936-6818

US Bankruptcy Court District of P.R.  
U.S. Post Office and Courthouse Building  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

ADVANCED COLLECTION SERVICES, INC.  
PO BOX 364607  
SAN JUAN, PR 00936-4607

AMERICAN EXPRESS  
PO BOX 1270  
NEWARK, NJ 07101-1270

AMERICAN EXPRESS  
PO BOX 29-7879  
FORT LAUDERDALE, FL 33329-7879

AMERICAN EXPRESS  
c/o BECKET AND LEE LLP  
PO BOX 3001  
MALVERN, PA 19355-0701

AMERICAN EXPRESS  
c/o BECKET AND LEE LLP  
PO BOX 3001  
MALVERN, PA 19355-0701

AMERICAN EXPRESS  
c/o BECKETT & LEE  
PO BOX 3001  
MALVERN, PA 19355-0701

AT&T MOBILITY  
P.O. BOX 15067  
SAN JUAN, PR 00902-8567

American Infosource Lp As Agent for  
T Mobile/T-Mobile USA Inc  
PO Box 248848  
Oklahoma City, OK 73124-8848

BANCO BILBAO VIZCAYA  
PO BOX 364745  
SAN JUAN, PR 00936-4745

BANCO DE DESARROLLO  
PO BOX 2134  
SAN JUAN, PR 00922-2134

BANCO POPULAR  
PO BOX 713575  
SAN JUAN, PR 00936-7077

BANCO POPULAR DE PUERTO RICO  
AS PURCHASING AGENT  
CONSUMER BANKRUPTCY UNIT  
PO BOX 1450  
MAYAGUEZ PR 00681-1450

BANCO POPULAR DE PUERTO RICO  
BANKRUPTCY DEPARTMENT  
PO BOX 366818  
SAN JUAN PR 00936-6818

BANCO SANTANDER  
PO BOX 191080  
SAN JUAN, PR 00919-1080

BANK OF AMERICA  
PO BOX 17054  
WILMINGTON, DE 19850-7054

Banco Santander PR  
c/o Ramos & Bague Law Office  
PO BOX 306  
Caguas PR 00726-0306

CHASE MANHATTAN BANK  
PO BOX 15548  
WILMINGTON, DE 19886-5548

CICA COLLECTION  
PO BOX 12338  
SAN JUAN, PR 00914-0338

CINGULAR WIRELESS  
PO BOX 192830  
SAN JUAN, PR 00919-2830

CITIBANK INTERNATIONAL  
PO BOX 8005  
S HACKENSACK, NJ 07606

CITIFINANCIAL  
P.O. BOX 71328  
SAN JUAN, PR 00936-8428

COLLECTION ADVISEMENT  
PO BOX 195162  
SAN JUAN, PR 00919-5162

COMMOLOCO  
PO BOX 41012  
MINILLAS STATION  
SAN JUAN, PR 00940-1012

COOP A/C DE CIALES  
PO BOX 1438  
CIALES, PR 00638-1438

COOP A/C JESUS OBRERO  
PMB 159 HC-01 BOX 29030  
CAGUAS, PR 00725-8900

CRIM  
LEGAL COUNSEL OFFICE  
PO BOX 195387  
SAN JUAN PR 00919-5387

Citibank Usa  
Attn.: Centralized Bankruptcy  
Po Box 20363  
Kansas City, MO 64195-0363

DEPTO. DE HACIENDA  
SECC CERTIFICACION  
BOX 4515, OFIC 405  
SAN JUAN, PR 00936

DORAL BANK  
PO BOX 195162  
SAN JUAN, PR 00919-5162

Department Stores National Bank/Macys  
Bankruptcy Processing  
PO Box 8053  
Mason, OH 45040-8053

FIA CARD SERVICES  
PO BOX 26012  
GREENSBORO, NC 27420-6012

FIRST BANK  
PO BOX 13817  
SAN JUAN, PR 00908-3800

FIRST BANK  
PO BOX 15019  
WILMINGTON, DE 19886-5019

FIRST REVENUE ASSUR  
PO BOX 5818  
DENVER, CO 80217-5818

FIRSTBANK OF PUERTO RICO  
BANKRUPTCY DIVISION  
P.O. BOX 9146  
SAN JUAN, P.R. 00908-0146

Fia Card Services, NA As Successor In Interco  
Bank of America NA and Mba America Bank  
1000 Samoset Drive  
DE5-023-03-03  
Newark, DE 19713-6000

GC SERVICES  
PO BOX 47455  
JACKSONVILLE, FL 32247-7455

GE Money Bank  
c/o Recovery Management Systems Corporation  
25 SE 2nd Ave Suite 1120  
Miami FL 33131-1605

GENB / Old Navy  
Attention: Bankruptcy  
Po Box 103104  
Roswell, GA 30076-9104

HOME DEPOT  
PROCESSING CENTER  
PO BOX 9101  
DES MOINES, IA 50306-9101

INTERNAL REVENUE SERVICE  
SPECIAL PROCEDURE RM 912  
MERC. PLAZA BLDG 27 1/2  
SAN JUAN, PR 00918

JOSE CANDELARIO LAJARA  
COND VICK CENTER OFIC 407D  
867 AVE MUÑOZ RIVERA  
SAN JUAN, PR 00925-2102

LCDR KRISTINA VIVONI  
PO BOX 2134  
SAN JUAN, PR 00922-2134

LCDR SALLY D DELGADO  
PO BOX 367054  
SAN JUAN, PR 00936-7054

MACYS/FDSB  
MACY'S BANKRUPTCY  
PO BOX 8053  
MASON, OH 45040-8053

NATIONWIDE COLLECTION  
PO BOX 26314  
LEHIGH VALLEY, PA 18002-6314

POPULAR AUTO  
PO BOX 15011  
SAN JUAN, PR 00902-8511

POPULAR AUTO (POPULAR LEASING)  
BANKRUPTCY DEPARTMENT  
PO BOX 366818  
SAN JUAN PUERTO RICO 00936-6818

(p) PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

PR ACQUISITIONS LLC  
250 MUÑOZ RIVERA AVENUE SUITE 1200  
HATO REY PR 00918-1814

PRA Receivables Management LLC  
As Agent Of Portfolio Recovery Assocs  
PO Box 12914  
Norfolk VA 23541-0914

PREFERRED HOME SERV  
PO BOX 4069  
BAYAMON PR 00958-1069

PREPA  
P.O.BOX 363508  
SAN JUAN, PR 00936-3508

PRTC  
PO BOX 71401  
SAN JUAN, PR 00936-8501

RONCOLI, BAERGA & ASSOC  
PO BOX 33894  
SAN JUAN, PR 00936-3894

Roundup Funding, LLC  
MS 550  
PO Box 91121  
Seattle, WA 98111-9221

SAMS CLUB  
Attn: BANKRUPTCY DEPARTMENT  
PO BOX 105968  
ATLANTA, GA 30348-5968

SANTANDER  
PO BOX 362589  
SAN JUAN, PR 00936-2589

SHELL COMPANY (PR) LIMITED  
BAYAMON, PR 00956

T MOBILE  
PO BOX 660252  
DALLAS, TX 75266-0252

UNIVERSAL FIDELITY LP  
PO BOX 941911  
HOUSTON, TX 77094-8911

WESTERNBANK  
PO BOX 1180  
MAYAGUEZ PR 00681 1180

ALEJANDRO OLIVERAS RIVERA  
ALEJANDRO OLIVERAS, CHAPTER 13 TRUS  
PO BOX 9024062  
SAN JUAN, PR 00902-4062

JUAN O CALDERON LITHGOW  
JUAN O CALDERON LITHGOW LEGAL OFFIC  
PO BOX 1710  
VEGA BAJA, PR 00694-1710

MAYRA BELEN DIAZ LAURBANO  
VILLA RICA  
CALLE EVANS AN 31  
BAYAMON, PR 00959-4911

MIGUEL ANGEL MARZAN BONILLA  
VILLA RICA  
CALLE EVANS AN 31  
BAYAMON, PR 00959-4911

MONSITA LECAROZ ARRIBAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901-1938

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

PORTFOLIO RC  
Attn: BANKRUPTCY  
PO BOX 41067  
NORFOLK, VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

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ANGEL M VAZQUEZ BAUZA  
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SAN JUAN, PR 00919-1017

(u) FIRSTBANK PUERTO RICO, CREDITOR

(u) FIRSTBANK PUERTO RICO

End of Label Matrix  
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Bypassed recipients 3  
Total 76